

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11682NMG

RI SEEKONK HOLDINGS, LLC)
Plaintiff,)
)
V.)
)
TIMOTHY P. MCINERNEY,)
individually and as in his)
capacity as town administrator)
of the TOWN OF SEEKONK)
and TOWN OF SEEKONK,)
Defendants.)

JOINT MOTION TO EXTEND CERTAIN SCHEDULING ORDER
DEADLINES

Now come the parties in the above-captioned matter, and jointly request this Honorable Court to extend the following deadlines of its current Scheduling Order:

- (1) All depositions be completed by May 29, 2006.
- (2) All trial experts of the parties be disclosed by April 25, 2006.
- (3) All dispositive motions, including motions for summary judgment, are to be filed by July 17, 2006 and responses by August 21, 2006.

As reasons for this motion, counsel for the defendants and plaintiff state that they require the additional time to complete depositions. Due to the plaintiff's schedule, his deposition (previously noticed) has not yet been taken. Due to issues concerning the attorney-client privilege and its possible waiver, former Town Council has requested time to research his response to a subpoena and this issue has delayed his testimony and seems destined to most likely

require some level of court review. Finally, recent discovery suggests the need for further follow-up not previously anticipated.

The parties will not be prejudiced by these proposed changes. Therefore, the parties respectfully request that this Court allow the proposed changes and adjust all remaining events accordingly.

PLAINTIFF,
RI SEEKONK
HOLDINGS, LLC,
By their attorney,

Respectfully submitted,
DEFENDANTS,
TIMOTHY McINERNEY and the
TOWN OF SEEKONK,
By their attorneys,

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Dated: March 1, 2006